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[Proposed] Counsel to the Debtor

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

INTERNATIONAL LONGSHORE
AND WAREHOUSE UNION,

Debtor.

Case No. 23-30662 (HLB)

Chapter 11

**NOTICE OF SECOND HEARING ON
DEBTOR'S FIRST DAY MOTIONS**

Hearing Date:

Date: November 9, 2023
Time: 10:00 a.m. (Pacific Time)
Place: Zoom / Telephonic
Judge: Hon. Hannah L. Blumenstiel

PLEASE TAKE NOTICE that the second hearing to consider the relief requested in the Employee Motion [Docket No. 7] and Cash Management Motion [Docket No. 8] (together, the “First Day Motions”)¹ filed by the above-captioned debtor (the “Debtor”) will be held on **November 9, 2023 at 10:00 a.m. (Pacific Time)** (the “Second Day Hearing”), or as soon thereafter as the matter may be heard, before the Honorable Hannah L. Blumenstiel, United States Bankruptcy Judge.

PLEASE TAKE FURTHER NOTICE that each interested party opposing or responding to the First Day Motions must file and serve their response no later than **November 2, 2023**. Failure to timely object may be deemed by the Court to constitute consent to the relief requested in the First Day Motions. No opposition shall exceed 10 pages, absent prior leave of the Court. This page limit

¹ A capitalized term used but not defined herein shall have the meaning ascribed to it in the First Day Motions.

1 shall not apply to declarations or requests for judicial notice that might be filed in support of any
2 opposition. Absent good cause, any untimely opposition will not be considered.

3 **PLEASE TAKE FURTHER NOTICE** that the hearing will not be conducted in the
4 presiding judge's courtroom but instead will be conducted by Zoom video or telephone. All
5 interested parties should consult the Bankruptcy Court's website (<https://www.canb.uscourts.gov/>)
6 for information explaining how to arrange an appearance at a video/telephonic hearing. If you have
7 questions about how to appear at the court hearing and participate in the video hearing, you may
8 contact the court by calling 888-821-7606 or by using the Live Chat feature on the Court's website.

9 Dated: October 5, 2023

PACHULSKI STANG ZIEHL & JONES LLP

11 /s/ Jason Rosell

12 Debra I. Grassgreen
13 Jason H. Rosell

14 *[Proposed] Counsel to the Debtor*
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